Mr. Don Lippelt H. V. Roll Center, Inc. 1079 Industry Drive, Lot 1 Chesterton, IN 46304

Re: 127-16950

Notice-only change to MSOP 129-11519-00091

Dear Mr. Lippelt:

H. V. Roll Center, Inc. was issued an MSOP on March 9, 2000, for a stationary source, hard chromium electroplating operation for reconditioning mill rolls. A letter notifying the Office of Air Quality of certain changes was received on March 21, 2003. The changes are related to the addition of one (1) 4000 gallon chromium electroplating tank, which is identical to the two (2) existing tanks, permitted in the MSOP. The new tank will be vented to the existing ScrubAir mesh pad air scrubber system. By design, only two (2) of the three tanks can be operated at a time. There will be no increase in the potential to emit of any pollutants as a result of this modification. Pursuant to 326 IAC 2-5.1-3, a source consisting of chromium electroplating tanks is required to obtain an MSOP irrespective of the level of emissions. According to 326 IAC 2-6.1-6(d)(13), a notice-only change can be used for "a modification that adds an emissions unit or units of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit or units, except if the modification would result in a potential to emit greater than the thresholds in 326 IAC 2-2 or 326 IAC 2-3". The requested modification meets this requirement, therefore, pursuant to the provisions of 326 IAC 2-6.1-6 the permit is hereby revised as follows (strikeout to show deletions and bold to show additions):

- (1) Section A.2 is modified as follows:
 - A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) Two (2) Three (3) hard chromium electroplating operations, identified as P-1 and, P-2, and P-3, using a composite mesh-pad system for control, each having a rectifier with a maximum potential capacity of 12,500 amps, exhausting to one (1) stack identified as S-1. By design, only one of the operations, P-2 or P-3 can be powered at one time.
- (2) The facility description in section D.1 is modified as follows:

Emissions Unit Description

(a) Two (2) Three (3) hard chromium electroplating operations, identified as P-1 and, P-2, and P-3, using a composite mesh-pad system for control, each having a rectifier with a maximum potential capacity of 12,500 amps, exhausting to one (1) stack identified as S-1.

By design, only one of the operations, P-2 or P-3 can be powered at one time.

H. V. Roll Center, Inc.
Page 2 of 5
Chesterton, Indiana
Notice-Only: 127-16950

- (3) Condition D.1.2(a) and (b) are modified as follows:
 - (a) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from Stack S-1 of P-1, and P-2, and P-3, by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm) of ventilation air (6.6 x 10⁻⁶ grains per dry standard cubic foot (gr/dscf)).
 - (b) The Permittee is subject to the following work practice standards, which address operation and maintenance practices:
 - (1) At all times, including periods of startup, shutdown, malfunction, and excess emissions, the Permittee shall operate and maintain P-1, and P-2, and P-3, including the composite mesh-pad system and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.1.4.
 - (2) (4)
 - (5) Based on the results of a determination made under paragraph (b)(4) of this condition, IDEM, OAQ may require that the Permittee make changes to the OMP required by Condition D.1.4. Revisions may be required if IDEM, OAQ finds that the plan:
 - (A) Does not address a malfunction or period of excess emissions that has occurred;
 - (B) Fails to provide for the operation of P-1, and P-2, and P-3, or the composite mesh-pad system and process monitoring equipment during a malfunction or period of excess emissions in a manner consistent with good air pollution control practices; or
- (4) Condition D.1.4 is modified as follows:
 - D.1.4 Operation and Maintenance Plan [40 CFR 63.342(f)(3)] [326 IAC 2-1.1-11]
 - (a) The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of the emissions units. The plan shall specify the operation and maintenance criteria for P-1, -and P-2, and P-3, the composite mesh-pad system, and monitoring equipment, and shall include the following elements:
 - (1) Quarterly visual inspection of the composite mesh-pad system to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device;
 - (2)(4)
 - (5) A standardized checklist to document the operation and maintenance criteria for P-1, and P-2, and P-3, the composite mesh-pad system, and monitoring equipment;
 - (6) Procedures to be followed to ensure that neither equipment or process

malfunctions due to poor maintenance or other preventable conditions nor excess emissions as indicated by monitoring data occur;

H. V. Roll Center, Inc. Chesterton, Indiana

Page 3 of 5 Notice-Only: 127-16950

- (7) A systematic procedure for identifying malfunctions of and periods of excess emissions from P-1, -and P-2, and P-3, the composite mesh-pad system, and monitoring equipment; and for implementing corrective actions to address such malfunctions and periods of excess emissions.
- (b) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or a period of excess emissions as indicated by monitoring data, the Permittee shall revise the OMP within forty five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining P-1, -and P-2, and P-3, the composite mesh-pad system, and monitoring equipment, during similar malfunction and excess emissions events, and a program for corrective action for such events.
- (c) If actions taken by the Permittee during periods of malfunction or excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAM OAQ.
- (d) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAQ for the life of P-1, and P-2, and P-3 or until P-1, and P-2, and P-3, are no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMP on record to be made available for inspection, upon request by IDEM, OAQ for a period of five (5) years after each revision to the plan.
- (5) Condition D.1.6 is modified as follows:
 - D.1.6 Monitoring to Demonstrate Continuous Compliance [40 CFR 63.343(c)(1)] [326 IAC 2-1.1-11]
 - (a) On and after the date on which the initial performance test required in Condition D.1.5 is required to be completed under 40 CFR 63.7, the Permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that either tank in P-1, or P-2, or P-3 is in operation. To be in compliance with the standards, the composite mesh-pad system shall be operated within ±1 inch of water column of the pressure drop value established during the initial performance test, or within the range of compliant values for pressure drop established during multiple performance tests.
- (6) Condition D.1.7 (b), (c) and (h) are modified as follows:
 - (b) Records of all maintenance performed on P-1, and P-2, and P-3, the composite mesh-pad system and monitoring equipment.
 - (c) Records of the occurrence, duration, and cause (if known) of each malfunction of P-1, and P-2, and P-3, the composite mesh-pad system and monitoring equipment and each period of excess emissions from P-1, and P-2, and P-3, and the composite mesh-pad system as indicated by monitoring data collected in accordance with paragraph (g) of this condition.

H. V. Roll Center, Inc. Chesterton, Indiana

Page 4 of 5 Notice-Only: 127-16950

- (h) The total operating time of P-1 and the total operating time of P-2 **or P-3** during the reporting period, operating time as defined in Condition D.1.6(b).
- (7) Condition D.1.8 is modified as follows:
 - D.1.8 Reporting Requirements [40 CFR 63.345 & 63.347] [326 IAC 2-1.1-11]

The notifications and reports required in this section shall be submitted to the address specified in Condition C.15 - General Reporting Requirements of this permit.

- (a) The Permittee may not construct a new emissions unit subject to 326 IAC 20-8-1 (including non-affected sources defined in 40 CFR 63.344(e)), or change, modify, or reconstruct P-1, or P-2, or P-3 (including addition of ductwork to the composite mesh-pad system or change in the air pollution control technique used to comply with Condition D.1.2) without submitting a Notification of Construction or Reconstruction for these new or reconstructed emissions units to IDEM, OAM OAQ.
 - (1) The application to construct P-1, and P-2, and P-3 serves as this notification. Likewise, a complete application for a permit revision shall serve as this notification for any new construction or reconstruction.
 - (2) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAM **OAQ** before construction or reconstruction may commence.
- (b) The Permittee shall submit an Initial Notification for P-1 and P-2 as follows:
 - (1) A notification of the date when construction or reconstruction of the emissions units was commenced shall be submitted no later than thirty (30) calendar days after such date.
- (c)
- (d) A Notification of Compliance Status is required for P-1, -and P-2, and P-3 and shall be submitted to IDEM, OAM-OAQ. The notification shall list all of the information required in 40 CFR 63.347(e)(2), including the test report documenting the results of the performance test required in Condition D.1.5, which contains the elements required by 40 CFR 63.344(a). Pursuant to Condition C.8 Performance Testing, the Notification of Compliance Status shall be submitted no later than forty-five (45) calendar days following completion of the performance test required in Condition D.1.5.
- (e) The Permittee shall report to IDEM, OAM **OAQ** the results of any future performance test conducted for P-1, or P-2, **or** P-3 as required by 40 CFR 63.7 and 63.343(b). Pursuant to Condition C.8 Performance Testing, results of a performance test shall be submitted no later than forty-five (45) days following the completion of the performance test.
- (f) The Permittee shall prepare a summary report to document the ongoing compliance status of the affected source. The Ongoing Compliance Status Report shall contain the information identified in 40 CFR 63.347(g)(3), shall be completed using the form provided with this permit. Because P-1, and P-2, and P-3 will be located at an area source site,

the Ongoing Compliance Status Report shall be retained on site and made available to IDEM, OAQ upon request.

H. V. Roll Center, Inc. Chesterton, Indiana

Page 5 of 5 Notice-Only: 127-16950

(8) References to the Office of Air Management (OAM) have been changed to Office of Air Quality (OAQ).

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Origonal signed by Paul Dubenetzky

Paul Dubenetzky, Chief Permits Branch Office of Air Quality

Attachments

mm

cc: File - Porter County

U.S. EPA, Region V

Porter County Health Department

Northwest Regional Office

Air Compliance Section Inspector - Dave Sampias

Compliance Data Section - Karen Nowak

Administrative and Development

Technical Support and Modeling - Michele Boner

NEW SOURCE CONSTRUCTION PERMIT and MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

H.V. Roll Center, Incorporated 1079 Industry Drive, Lot 1 Chesterton, IN 46304

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1 if new source, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 127-11519-00091

Issued by:
Paul Dubenetzky, Branch Chief
Office of Air Quality

Issuance Date: 3-9-2000

1st Notice-Only Change No.: 127-12823 Issuance Date: 11-3-2000 2nd Notice-Only Change No.: 127- 12925 Issuance Date: 12-1-2000

2nd Notice-Only Change No.: 127- 12925 Issuance Date: 12-1-2000 3rd Notice-Only Change No.: 127-13598 Issuance Date: 1-18-2001

4th Notice-Only Change No.: 127-16950 Pages Modified: 4, 15-20

Issued by: Original signed by Paul Dubenetzky

Paul Dubenetzky, Branch Chief

Office of Air Quality

Issuance Date: April 3, 2003

H. V. Roll Center, Inc. Chesterton, Indiana Permit Reviewer: PR/EVP 4th Notice-Only Change No.: 127-16950 Modified By: Madhurima D. Moulik

odified By: Madhurima D. Moulik MSOP No.: 127-11519-00091

Page 4 of 25

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary source, hard chromium electroplating operation for reconditioning mill rolls.

Authorized Individual: Don Lippelt

Source Address: 1079 Industry Drive, Lot 1, Chesterton, IN 46304 Mailing Address: 1079 Industry Drive, Lot 1, Chesterton, IN 46304

Phone Number: 219-886-7655 SIC Code: 3471 County Location: Porter

County Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD Rules:

Minor Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

(a) Three (3) hard chromium electroplating operations, identified as P-1, P-2, and P-3, using a composite mesh-pad system for control, each having a rectifier with a maximum potential capacity of 12,500 amps, exhausting to one (1) stack identified as S-1. By design, only one of the operations, P-2 or P-3 can be powered at one time.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is not required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a minor source, as defined in 326 IAC 2-7-1(22);
- (b) It is not an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3);
- (c) It is not in a source in a source category designated by the United States Environmental

H. V. Roll Center, Inc. Chesterton, Indiana Permit Reviewer: PR/EVP 4th Notice-Only Change No.: 127-16950 Modified By: Madhurima D. Moulik Page 15 of 25

MSOP No.: 127-11519-00091

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description

(a) Three (3) hard chromium electroplating operations, identified as P-1, P-2, and P-3, using a composite mesh-pad system for control, each having a rectifier with a maximum potential capacity of 12,500 amps, exhausting to one (1) stack identified as S-1. By design, only one of the operations, P-2 or P-3 can be powered at one time.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the emissions units described in this section except when otherwise specified in 40 CFR Part 63, Subpart N.

D.1.2 Chromium Electroplating NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N] [326 IAC 2-1.1-11]

These emissions units are subject to 40 CFR Part 63, Subpart N (National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks), which is incorporated by reference as 326 IAC 20-8-1. A copy of this rule is attached. The Permittee shall comply with the requirements in this condition on and after the startup date.

The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for affected sources subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction, but the work practice standards that address operation and maintenance and are required by paragraph (b) of this condition must be followed during malfunctions.

- (a) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from Stack S-1 of P-1, P-2, and P-3 by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm) of ventilation air (6.6 x 10⁻⁶ grains per dry standard cubic foot (gr/dscf)).
- (b) The Permittee is subject to the following work practice standards, which address operation and maintenance practices:
 - (1) At all times, including periods of startup, shutdown, malfunction, and excess

emissions, the Permittee shall operate and maintain P-1, P-2, and P-3, including the composite mesh-pad system and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.1.4.

- (2) Malfunctions and excess emissions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.1.4.
- (3)These operation and maintenance requirements are enforceable independent of emissions limitations or other requirements in this section.

H. V. Roll Center, Inc. Chesterton, Indiana Permit Reviewer: PR/EVP 4th Notice-Only Change No.: 127-16950 Modified By: Madhurima D. Moulik MSOP No.: 127-11519-00091

Page 16 of 25

- (4) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to IDEM, OAQ, which may include, but is not limited to, monitoring results; review of the OMP, procedures, and records; and inspection of the source.
- (5) Based on the results of a determination made under paragraph (b)(4) of this condition, IDEM, OAQ may require that the Permittee make changes to the OMP required by Condition D.1.4. Revisions may be required if IDEM, OAQ finds that the plan:
 - (A) Does not address a malfunction or period of excess emissions that has occurred:
 - (B) Fails to provide for the operation of P-1, P-2, and P-3, or the composite mesh-pad system and process monitoring equipment during a malfunction or period of excess emissions in a manner consistent with good air pollution control practices; or
 - (C) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment or other causes of excess emissions as quickly as practicable.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan (PMP), in accordance with the Section B condition entitled "Preventive Maintenance Plans" of this permit is required for P-1, P-2, and P-3, and the composite mesh-pad system.

Operation and Maintenance Plan [40 CFR 63.342(f)(3)] [326 IAC 2-1.1-11] D.1.4

- The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of the emissions units. The plan shall specify the operation and maintenance criteria for P-1, P-2, and P-3, the composite mesh-pad system, and monitoring equipment, and shall include the following elements:
 - (1) Quarterly visual inspection of the composite mesh-pad system to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device;
 - (2)Quarterly visual inspection of the back portion of the mesh-pad closest to the fan to ensure there is no breakthrough of chromic acid mist;
 - (3)Quarterly visual inspection of the ductwork from the tanks to the control device to ensure there are no leaks:

- (4) Perform washdown of the composite mesh-pads in accordance with manufacturer's recommendations.
- (5) A standardized checklist to document the operation and maintenance criteria for P-1, P-2, and P-3 the composite mesh-pad system, and monitoring equipment;
- (6) Procedures to be followed to ensure that neither equipment or process malfunctions due to poor maintenance or other preventable conditions nor excess emissions as indicated by monitoring data occur;
- (7) A systematic procedure for identifying malfunctions of and periods of excess emissions from P-1, P-2, and P-3, the composite mesh-pad system, and monitoring

H. V. Roll Center, Inc. Chesterton, Indiana Permit Reviewer: PR/EVP 4th Notice-Only Change N0.: 127-16950 Modified By: Madhurima D. Moulik

equipment; and for implementing corrective actions to address such malfunctions and periods of excess emissions.

Page 17 of 25

MSOP No.: 127-11519-00091

- (b) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or a period of excess emissions as indicated by monitoring data, the Permittee shall revise the OMP within forty five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining P-1, P-2, and P-3, the composite mesh-pad system, and monitoring equipment, during similar malfunction and excess emissions events, and a program for corrective action for such events.
- (c) If actions taken by the Permittee during periods of malfunction or excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAQ.
- (d) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAQ for the life of P-1, P-2, and P-3 or until P-1, P-2, and P-3 are no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMP on record to be made available for inspection, upon request by IDEM, OAQ for a period of five (5) years after each revision to the plan.
- (e) The Permittee may use applicable standard operating procedures (SOP) manuals, occupational safety and health administration (OSHA) plans, or other existing plans such as the PMP required in Condition D.1.3, as the OMP provided the alternative plans meet the criteria listed above in Condition D.1.4(a).

Compliance Determination Requirements

D.1.5 Performance Testing [40 CFR 63.343, 63.344, and 63.7]

- (a) The Permittee is required to conduct an initial performance test within 180 days after startup of the emissions units using the procedures and methods listed in 40 CFR 63.344 and 63.7 and in accordance with the provisions of Condition C.8 Performance Testing of this permit.
- (b) During the initial performance test, the Permittee shall determine the outlet chromium concentration of the composite mesh-pad system using the test methods and procedures in 40 CFR 63.344(c) and shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the emission limitation in Condition D.1.2(a) using the procedures in 40 CFR 63.344(d)(5). The Permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as

the compliant value the average pressure drop measured over the three (3) test runs of one performance test, and accept ±1 inch of water column from this value as the compliant range.

Compliance Monitoring Requirements

D.1.6 Monitoring to Demonstrate Continuous Compliance [40 CFR 63.343(c)(1)] [326 IAC 2-1.1-11]

(a) On and after the date on which the initial performance test required in Condition D.1.5 is

H. V. Roll Center, Inc. Chesterton, Indiana Permit Reviewer: PR/EVP 4th Notice-Only Change N0.: 127-16950 Modified By: Madhurima D. Moulik

required to be completed under 40 CFR 63.7, the Permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that either tank in P-1, P-2, or P-3 is in operation. To be in compliance with the standards, the composite mesh-pad system shall be operated within ±1 inch of water column of the pressure drop value established during the initial performance test, or within the range of compliant values for pressure drop established during multiple performance tests.

Page 18 of 25

MSOP No.: 127-11519-00091

(b) Tank operation or operating time for chromium electroplating is defined as that time when the rectifier is turned on and a part is in the tank. When there is no part in a tank for fifteen (15) or more minutes, the tanks will not be considered to be in operation, and that time will not be considered operating time. Likewise, if the time between placing a part in the tank is less than fifteen (15) minutes, the tanks will be considered to be in operation, and that time will be considered part of the operating time.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2- 6.1-5(a)(2)]

D.1.7 Record Keeping Requirements [40 CFR 63.346] [326 IAC 2-1.1-11]

The Permittee shall maintain records to document compliance with Conditions D.1.2 and D.1.4 using the forms provided with this permit. These records shall be maintained in accordance with the Section C condition entitled "General Record Keeping Requirements" of this permit, and include a minimum of the following:

- (a) Inspection records for the composite mesh-pad system and monitoring equipment to document that the inspection and maintenance required by Conditions D.1.3 and D.1.4 have taken place. The record can take the form of a checklist and should identify the following:
 - (1) The device inspected;
 - (2) The date of inspection;
 - (3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and
 - (4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.
- (b) Records of all maintenance performed on P-1, P-2, and P3, the composite mesh-pad system and monitoring equipment.
- (c) Records of the occurrence, duration, and cause (if known) of each malfunction of P-1, P-2, and P-3, the composite mesh-pad system and monitoring equipment and each period of excess

- emissions from P-1, P-2, and P-3, and the composite mesh-pad system as indicated by monitoring data collected in accordance with paragraph (g) of this condition.
- (d) Records of actions taken during periods of malfunction or excess emissions when such actions are inconsistent with the OMP.
- (e) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.
- (f) Test reports documenting results of all performance tests and all measurements as may be necessary to determine the conditions of performance tests, including measurements

H. V. Roll Center, Inc. Chesterton, Indiana Permit Reviewer: PR/EVP 4th Notice-Only Change N0.: 127-16950 Modified By: Madhurima D. Moulik Page 19 of 25

MSOP No.: 127-11519-00091

necessary to determine compliance.

- (g) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.
- (h) The total operating time of P-1 and the total operating time of P-2 or P-3 during the reporting period, operating time as defined in Condition D.1.6(b).
- (i) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10, and Condition D.1.8.

D.1.8 Reporting Requirements [40 CFR 63.345 & 63.347] [326 IAC 2-1.1-11]

The notifications and reports required in this section shall be submitted to the address specified in Condition C.15 - General Reporting Requirements of this permit.

- (a) The Permittee may not construct a new emissions unit subject to 326 IAC 20-8-1 (including non-affected sources defined in 40 CFR 63.344(e)), or change, modify, or reconstruct P-1, P-2, or P-3 (including addition of ductwork to the composite mesh-pad system or change in the air pollution control technique used to comply with Condition D.1.2) without submitting a Notification of Construction or Reconstruction for these new or reconstructed emissions units to IDEM, OAQ.
 - (1) The application to construct P-1, P-2, and P-3, serves as this notification. Likewise, a complete application for a permit revision shall serve as this notification for any new construction or reconstruction.
 - (2) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAQ before construction or reconstruction may commence.
- (b) The Permittee shall submit an Initial Notification for P-1, P-2, and P-3 as follows:
 - (1) A notification of the date when construction or reconstruction of the emissions units was commenced shall be submitted no later than thirty (30) calendar days after such date.
 - (2) A notification of the actual date of startup of the emissions units shall be submitted within thirty (30) calendar days after such date.
- (c) The Permittee shall notify IDEM, OAQ in writing of their intention to conduct the initial

performance test required in Condition D.1.5 and any future performance tests conducted as required by 40 CFR 63.7 and 63.343(b) at least sixty (60) calendar days before the test is scheduled to begin.

- (1) Pursuant to Condition C.8 Performance Testing, a test protocol shall be submitted no later than thirty-five (35) days prior to the intended test date.
- (2) In the event the Permittee is unable to conduct the performance test as scheduled, pursuant to 40 CFR 63.7(b)(2) the Permittee shall notify IDEM, OAQ within five (5) days prior to the scheduled performance test date and specify the date when the performance test is rescheduled. Pursuant to Condition C.8 Performance Testing, the rescheduled performance test date shall be no sooner than fourteen (14) days after IDEM, OAQ is notified in writing of the need to

H. V. Roll Center, Inc. Chesterton, Indiana Permit Reviewer: PR/EVP 4th Notice-Only Change No.: 127-16950 Modified By: Madhurima D. Moulik Page 20 of 25 MSOP No.: 127-11519-00091

reschedule.

- (d) A Notification of Compliance Status is required for P-1 and P-2 and shall be submitted to IDEM, OAQ. The notification shall list all of the information required in 40 CFR 63.347(e)(2), including the test report documenting the results of the performance test required in Condition D.1.5, which contains the elements required by 40 CFR 63.344(a). Pursuant to Condition C.8 Performance Testing, the Notification of Compliance Status shall be submitted no later than forty-five (45) calendar days following completion of the performance test required in Condition D.1.5.
- (e) The Permittee shall report to IDEM, OAQ the results of any future performance test conducted for P-1 or P-2 as required by 40 CFR 63.7 and 63.343(b). Pursuant to Condition C.8 - Performance Testing, results of a performance test shall be submitted no later than forty-five (45) days following the completion of the performance test.
- (f) The Permittee shall prepare a summary report to document the ongoing compliance status of the affected source. The Ongoing Compliance Status Report shall contain the information identified in 40 CFR 63.347(g)(3), shall be completed using the form provided with this permit. Because P-1, P-2, and P-3 will be located at an area source site, the Ongoing Compliance Status Report shall be retained on site and made available to IDEM, OAQ upon request.
 - (1) The Ongoing Compliance Status Report shall be completed according to the following schedule except as provided in paragraphs (f)(2) through (4) of this condition.
 - (A) The first report shall cover the period from the start-up date of the emissions units to December 31 of the year in which the emissions units begin operation.
 - (B) Following the first year of reporting, the report shall be completed on a calendar year basis with the reporting period covering from January 1 to December 31.
 - (2) If either of the following conditions are met, semiannual reports shall be prepared and submitted to IDEM. OAQ:
 - (A) The total duration of excess emissions (as indicated by the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c)) is one percent (1%) or greater of the total operating time as defined in Condition D.1.6(b) for the reporting period; or

(B) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is five percent (5%) or greater of the total operating time as defined in Condition D.1.6(b).

Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted semiannually until a request to reduce reporting frequency is approved by IDEM, OAQ.

(3) IDEM, OAQ may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report